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Attorneys for Defendants
Gabriele Israilovici and Giovanni Nappi

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE

CECCHI GORI PICTURES, INC., a
California
corporation; CECCHI GORI USA, INC., a
California corporation,

Debtors.

Case No. 16-53499
(Administratively consolidated with Case No. 16-
53500)
Chapter 11
Adv. No. 17-05084
Judge: Hon. M. Elaine Hammond

**NOTICE OF MOTION AND MOTION FOR
SUMMARY ADJUDICATION THAT THE
STATUTE OF LIMITATIONS BARS THE
FIRST, SECOND AND THIRD CLAIMS FOR
RELIEF**

FILED WITH:

- 1. MEMORANDUM OF POINTS AND
AUTHORITIES;**
- 2. DECLARATIONS OF BRENT
BLAKELY AND GIOVANNI NAPPI;
AND**
- 3. APPENDIX OF EXHIBITS**

CECCHI GORI PICTURES, INC. and
CECCHI GORI USA, INC.,

Plaintiffs,

v.

GABRIELE ISRAILOVICI, an individual,
GIOVANNI NAPPI, an individual, and
KLAGI LIMITED (a/k/a KLAGI
MANAGEMENT LIMITED and KLAGI
LTD.), a Hong Kong corporation

Defendants.

Hearing:

Date: June 24 .2109

Time: 11:00 a.m.

Place: Courtroom 3020

280 So. First St.

San Jose. CA 95113-3099

1 PLEASE TAKE NOTICE at the time and place noted above or as soon thereafter as
2 counsel may be heard, Defendants GABRIELE ISRAILOVICI and GIOVANNI NAPPI
3 (collectively, the "Moving Parties") hereby move this Court to grant summary judgment on the
4 first three claims for relief in the First Amended Complaint ("FAC") [Adv. Dkt. No. 24] under
5 Federal Rule of Bankruptcy Procedure 7056 (the "Motion") because there are no genuine triable
6 issues of fact; and as such, each of said claims for relief are barred by the statute of limitations.

7 The Motion is based on the accompanying appendix of exhibits, declarations and
8 memorandum of points and authorities, those matters of which the Court may take judicial
9 notice, the pleadings and papers on file with this Court and any argument or evidence presented
10 at the hearing on the Motion.

11 Any opposition to the Motion must be in writing and served and filed with the Court no
12 later than fourteen (14) days prior to the hearing date noted above. Failure to file an opposition
13 to the Motion may be deemed to be consent to the relief sought.

14 Dated: May 24, 2019

WEISS & SPEES, LLP

15 /s/ Michael H. Weiss

16 Attorneys for Defendants

17 Gabriele Israilovici and Giovanni Nappi
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